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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	Chapter 11
Scott P. Cowan,	Case No. 16-14758 (SLM)
Debtor	

**APPLICATION FOR ORDER SHORTENING TIME RE: DEBTOR'S MOTION
ORDER THE SALE OF REAL PROPERTY, FREE AND CLEAR OF ALL
LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES**

TO: The Honorable Stacey L. Meisel
United States Bankruptcy Judge

Scott P. Cowan (the "Debtor"), by and through his counsel David L. Stevens, respectfully states as follows:

Debtor: Scott P. Cowan

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1. The Debtor has filed a Motion for an Order Authorizing the Sale of the property (the "Sale Motion") located at 48 Harold Lane, Manahawkin, New Jersey (the "Property"), As Is, Where Is, and free and clear of interests, claims, lines and encumbrances.
2. The Property has been marketed for sale since August 26, 2016 with an asking price of \$279,900. As stated in the Sale Motion, the Property is built on a slab foundation nearly two feet below the FEMA minimal elevation requirements, and due to its location near Manahawkin Bay, it is destined to flood in the future. Because slab homes are not easily raised to avoid future flooding, the Property is particularly difficult to sell. The cost of flood insurance is prohibitive to most buyers.
3. Prior to commencement of this case, the Debtor had not received any written offers to purchase the Property. It was shown to approximately thirty potential buyers, many of whom like the home but reconsidered making an offer once the flood insurance issue was disclosed.
4. The Debtor has entered into a contract of sale to sell the Property for the sum of \$287,500. The expected closing date was set for September 30, 2016, but was postponed due to a delay in the procurement of a Title Report, Elevation Certification and other pertinent documents needed for the consummation of the sale and the filing of the Sale Motion.

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5. The Debtor is now anxious to quickly consummate the sale out of fear that the only available purchasers will walk away from the sale of the Property for being unable to obtain court authorization prior to the closing of the sale.

6. It is imperative for the Debtor to sell the Property because it is an administrative burden on the bankruptcy estate, and the Debtor is relying on the net proceeds from the sale to assist with the funding of a Chapter 11 plan of reorganization.

7. The entry of the Order Shortening Time is not prohibited by Federal Rule of Bankruptcy Procedure 9006(c) and the rules cited therein.

SCURA, WIGFIELD, HEYER & STEVENS, LLP
Attorneys for Scott Cowan

By: /s/ David L. Stevens
David L. Stevens

Dated: October 6, 2016